



July 10, 2024

**BY ECF**

Honorable Sanket J. Bulsara  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Diaz Cruz v. United States of America*, 20 CV 891 (EK) (SJB)

Your Honor:

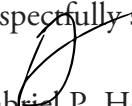
I represent plaintiff in the above-referenced action. I write on behalf of the parties to respectfully request that the deadline for the completion of discovery be extended from October 4, 2024 to January 10, 2025. This is the parties' first request to extend the discovery deadline.

If it should please the Court, the parties have worked cooperatively and diligently to complete document discovery in this complex case, in which plaintiff alleges injuries due to a shooting by an Immigration and Customs Enforcement Agent in Brooklyn. The parties have exchanged document requests and responses and produced more than a thousand pages of records. Plaintiff has authorized the defense to obtain his treatment records from more than a dozen providers and the government is in the process of obtaining that material. The parties are in the process of scheduling plaintiff to appear for a physical examination, which will involve him traveling to the United States from Mexico and which the parties hope to coordinate with his deposition to avoid him taking multiple international trips.

In light of the foregoing, the parties respectfully request that the deadline to complete discovery be extended from October 4, 2024 to January 10, 2025.

Thank you for your consideration of this request.

Respectfully submitted,

  
Gabriel P. Harvis

cc: Defense Counsel